
FINDING OF NO SIGNIFICANT IMPACT (FONSI)

DEPARTMENT OF VETERANS AFFAIRS

SEISMIC UPGRADES AND SPECIALTY CARE IMPROVEMENTS TO THE FORT HARRISON MEDICAL CENTER HELENA, LEWIS AND CLARK COUNTY, MONTANA

The US Department of Veterans Affairs (VA) assessed the potential impacts associated with the proposed seismic upgrades and specialty care improvements (Proposed Action) to the Fort Harrison Medical Center. An Environmental Assessment was prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, the President's Council on Environmental Quality regulations to implement NEPA (40 CFR Parts 1500-1508), and the Department of Veteran Affairs Environmental Compliance Manual and VA regulations (Title 38 CFR Part 26). The attached EA is incorporated by reference into this Finding of No Significant Impact (FONSI).

BACKGROUND

The Seismic Upgrade and Specialty Care Improvements project (Project) is situated within the central portion of the VA-owned Fort Harrison VAMC campus approximately 3.5 miles northwest of Helena, Lewis and Clark County, Montana (site). Fort William Henry Harrison is located immediately north of the Project, with associated training areas to the west. The Project area is underpinned by the Northern Rocky Mountains and lies at the base of Helena Valley's rolling foothills, approximately 4,008 feet above mean sea level (USGS 2001). Local terrain is generally flat and vegetation primarily consists of maintained lawn, shrub, and trees.

In 1892, the property was designated as a troop training site, and by 1895, soldiers were training at the fort. Fort Harrison became United States Public Health Service Hospital Number 72 in 1921 in response to the growing medical needs of returning American World War I veterans (VA 2017a). There have been numerous expansions and renovations to the hospital in the years since. Notably in 1935, an earthquake damaged ten campus buildings including the heating systems of the main hospital building, forcing the building to close for two years while repairs were made.

VA Directive 7512 establishes policy regarding the seismic safety of VA buildings, and facilities identified as critical and essential must meet additional requirements to remain operational after a seismic event. VAMC Fort Harrison is located within a seismically active area classified as "Moderate High," and in recognition of this, the VA commissioned a seismic study of the primary facilities comprising the medical center to determine to what extent these buildings meet the current seismic codes (Layton 2017a, Layton 2017b, Layton 2017c, Layton 2017d). The five structures included in these studies included in the study were the Administrative Building (Bldg. 141), Dietetics Building (Bldg. 150), Main Hospital Building (Bldg. 154), Outpatient Building (Bldg. 154A), and corridor connecting Buildings 141, 150, 154 (i.e., Connecting Corridor [CC]). The results of the seismic study revealed that all buildings evaluated do not meet current seismic code standards and require seismic retrofits to achieve compliance.

Two additional buildings on the VAMC Fort Harrison campus are planned and include Outpatient Primary Care (Bldg. 172) and Outpatient Mental Health (Bldg. 173). Construction of these facilities is estimated to commence Spring 2020 and Fall 2018, respectively. These new facilities were not evaluated in this Environmental Assessment (EA).

SUMMARY OF PROPOSED ACTION

The Proposed Action sets out to correct identified seismic deficiencies of the Medical Center Complex through structural retrofits, while simultaneously maintaining the full capabilities of mission-critical operations within the Medical Center Complex during retrofitting activities. Based on a previous analysis, it was concluded that construction of a new three-story, 80,000-square foot medical facility adjacent to Building 154 is needed to house all Acute Inpatient Care and associated functions prior to initiating retrofitting activities. Because the new Acute Inpatient Care medical facility is to be sited on existing parking lot footprint (parking lots C, D, and E), a new parking structure is needed to compensate for lost parking. The proposed location of the parking structure is within the existing north parking lot footprint (parking lots L and K). Other proposed locations of the Acute Inpatient Care building and parking structure were evaluated, but the identified preferred locations minimized cost and impacts to medical facility operation and cultural resources.

Following construction of the new medical facility, select medical departments will be transferred from the Medical Center Complex, and Buildings 141, 150, 154, 154A, and the connecting corridor will be structurally retrofitted to correct seismic structural deficiencies in accordance with VA codes. Lastly, significant portions of Buildings 141, 154, and 154A are in disrepair and a total remodel is needed (estimated at 120,000 square feet) to create space to accommodate projected needs, as identified in the 2013 Facility Master Planning session.

In addition to the Proposed Action described above, several alternatives were considered. Alternatives to the Proposed Action include:

Plan North Building

The Plan North Building is proposed to be located north of Building 171. Patient logistics would include transferring patients from this location to the Medical Center Complex via an enclosed patient transfer corridor bridge.

Plan North Building distance from the existing Medical Center Complex would require new underground utility tunnels and approximately 460-foot enclosed patient transfer corridor bridge. Approximately 150 feet of the enclosed bridge would be on top of existing Building 154A which was not designed for a future floor. Construction of a corridor bridge would have high operational impact on patient transfers and create additional associated cost with the significant length and structural improvements required for construction.

Parade Grounds Building

The Parade Grounds Building is located south of Building 154 in what is known as the Historic Parade Grounds, a contributing feature to VAMC Fort Harrison Historic District, and may host buried cultural resources. Patient logistics would include transferring patients to the main facility via an enclosed patient transfer corridor bridge sited at or below grade.

Construction of a Parade Grounds Building would result in direct adverse effect on the parade ground, which is a contributing feature to the Fort Harrison Historic District. Extensive consultation, investigation, and monitoring are likely to be recommended by the Montana State Historic Preservation Officer (SHPO), Native American Tribes, and other consulting parties. This effectively eliminates the Parade Grounds Building as a feasible alternative.

No parking space would be lost with this alternative.

Attachment A. Mitigation Measures

Resource	Proposed Action Impacts	Proposed Action Mitigation
Air Quality	<p>Temporary, minor negative impacts to air quality may occur from construction activities such as fugitive dust or renovation of ACM.</p> <p>A significant effect is not anticipated for this impact.</p>	<p>Appropriate dust control measures and the implementation of relevant USEPA and OSHA safe work practices would limit impacts during construction. Dust would be controlled via watering the site or applying soil stabilizers.</p>
Hydrology and Water Quality	<p>Construction and renovation would occur on a previously disturbed and partially developed site. The Project would disturb approximately 0.72 acres of soil. Where renovation is proposed, existing landscape would be left undisturbed.</p> <p>A significant effect is not anticipated for this impact.</p>	<p>Prior to construction, a Storm Water Pollution Prevention Plan (SWPPP) will be implemented employing Best Management Practices designed to protect adjacent areas and the municipal storm sewer system from unauthorized discharges of pollutants. BMPs may include operational controls, sediment barriers, spill kits, drip pans, and revegetation. BMPs will be inspected regularly and maintained per requirements of MDEQ's General Permit for Construction.</p>
Noise	<p>Noise levels would temporarily increase during construction. Construction noise would be limited to daylight hours and to typical construction equipment. Blasting or pile driving is unlikely to occur. Should such construction methods be required, alternative, less noisy methods may be used. Any increase in noise could temporarily deter use of the site by area wildlife.</p> <p>A significant effect is not anticipated for this impact.</p>	<p>Construction workers would be required to adhere to the PEL of 90 dB per 8-hour work day.</p> <p>Should pile driving be required, less noisy construction methods may be used (e.g., drilled shafts, micropiles).</p>
Solid and Hazardous Waste	<p>Potential temporary and minor effects from lead-based paint and ACM are possible during renovation of the existing buildings.</p> <p>A significant effect is not anticipated for this impact.</p>	<p>All contractors would be lead-safe trained and certified. Lead-based paint would be encapsulated with non-lead paint. Thorough testing for ACM would occur prior to renovation. Disturbance to ACM would be limited to the few areas where building modification is necessary. An ACM abatement and encapsulation plan would be prepared prior to renovation and the Project would apply for an asbestos permit from the DEQ.</p>
Transportation and Parking	<p>Construction and renovation of the Project would result in a temporary</p>	<p>The Project would develop a Traffic and Parking Plan to be implemented during</p>

Resource	Proposed Action Impacts	Proposed Action Mitigation
	influx of contractor vehicles and traffic to the hospital campus during daily work hours. Temporary road closures would occur during new utility hookups. There would be no permanent road changes or rerouting on Project completion.	renovation and construction activities on the Fort Harrison VAMC campus. The plan would identify contractor parking locations, re-route traffic around affected areas, and present alternatives for staff and visitors. Construction-related truck traffic shall be scheduled to avoid peak travel time on the adjacent thoroughfares, as feasible. The
	A significant effect is not anticipated for this impact.	construction contractor shall provide a copy of the Traffic Control Plan to the local traffic authority for review prior to construction. If pedestrian or bicycle routes on the Fort Harrison VAMC campus are temporarily blocked, then alternate routes around construction areas would be provided to the extent feasible. These alternate routes would be posted on campus during the duration of construction.

No-Action

The Medical Facility Complex would remain in its current layout and condition, and only non-recurring maintenance costs would be incurred. Structural deficiencies would not be corrected and the entire Medical Facility Complex would continue to be vulnerable to seismic events and remain out of compliance with VA building code. Ultimately, a seismic event experienced by the facility may result in serious harm to patients and staff as well as structural damage requiring the medical facility to be shut down, thereby negatively impacting the health and safety of patients and staff, and the quality of Veteran healthcare services.

SUMMARY OF ENVIRONMENTAL CONSEQUENCES

The Proposed Action is expected to result in long-term beneficial impacts to aesthetics, community services, cultural resources, resident population, seismic hazards, and transportation and parking.

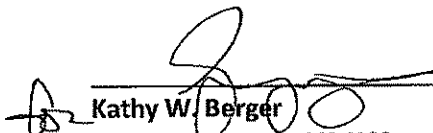
Construction activities have the potential to generate dust, noise, stormwater runoff, and disruptions to parking, transportation, and patient services. Best management practices and mitigation measures outlined in the EA will minimize the potential for construction related short-term adverse impacts to air quality, water quality, noise, solid and hazardous waste, and transportation and parking.

AGENCY AND PUBLIC COMMENT

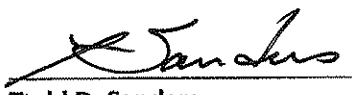
The Notice of Availability for the Draft EA published in the Helena Independent Record newspaper on June 15, 2018 and letters mailed to stakeholders including, state, local governmental organizations and tribes. Hardcopies of Draft EA were available at the Helena public library and VAMC Fort Harrison, and an electronic version available on the VA website from June 15 through July 15, 2018. One letter commenting on the Draft EA was received and considered in the Final EA.

FINDING OF NO SIGNIFICANT IMPACT

This FONSI is based on the attached EA. The analysis performed in the EA concludes that there would be no severe short-term, long-term or cumulative impacts to the human environment, provided best management practices and mitigation measures outlined in the EA, and also included in Attachment A, are fully implemented. Therefore, this FONSI is appropriate and an Environmental Impact Statement is not required.


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Date: 3 Aug 2018


Todd D. Sanders
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Date: 8-6-18